



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

FE3 -1 2019

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. James M. Clabby  
President  
JMC Environmental Consultants, Inc.  
2109 Bridge Avenue, Building B  
Point Pleasant, New Jersey 08742

Re: Request for Minor Modification to EPA's 2009 Risk-Based Disposal Approval  
Arsynco Incorporated, Foot of 13<sup>th</sup> Street, Carlstadt, New Jersey  
EPA I.D. No.: NJD 044688935

Dear Mr. Clabby:

This is in response to your December 20, 2018 correspondence regarding the above-referenced site. Your correspondence conveys a request, by Arsynco, Inc. (Arsynco), for a minor modification to the United States Environmental Protection Agency's (EPA's) February 12, 2009 risk-based polychlorinated biphenyl (PCB) disposal approval (the "EPA Approval") in accordance with the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2601 et.seq., and the regulations set forth in 40 C.F.R. Part 761.

In addition to the site wide perimeter fence required as part of the EPA approval, Arsynco is proposing to install an additional 6-foot high fence around the TSCA Disposal Areas within Tract 1. Arsynco is also requesting that the PCB marking signs (as required by 40 CFR § 761.45(a)) be placed on the fencing that surrounds the TSCA Disposal Areas at the required spacing of every 25 feet. The additional fence is to be installed at the base of the berm that surrounds both TSCA Disposal Areas. The fencing will include a gate to allow vehicle access for cap maintenance work and future parking, if necessary.

Please be advised that EPA has reviewed the information contained in your December 20<sup>th</sup> correspondence and hereby approves Arsynco's request. Please note that all other terms and conditions of the February 12, 2009 risk-based PCB disposal approval remain in effect. If you have any questions, please contact Sam Abdellatif, of my staff, at (212) 637-4103.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Adolph Everett", is written over a horizontal line.

Adolph Everett, Chief  
Hazardous Waste Programs Branch

cc: Jay Nickerson, NJDEP CM-BCM



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NEW YORK, NY 10007-1866

JUL 22 2016

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. James M. Clabby  
President  
JMC Environmental Consultants, Inc.  
2109 Bridge Avenue  
Building B  
Point Pleasant, New Jersey 08742

Re: Request for Minor Modification to EPA's 2009 Risk -Based Disposal Approval  
Arsynco, Inc., Foot of 13<sup>th</sup> Street, Carlstadt, New Jersey  
EPA I.D. No: NJD 044688935

Dear Mr. Clabby:

This is in response to your June 22, 2016 correspondence regarding the above-referenced site. Your correspondence conveys a request, by Arsynco, Inc. (Arsynco), for a minor modification to the United States Environmental Protection Agency's (EPA's) February 12, 2009 risk-based polychlorinated biphenyl (PCB) disposal approval in accordance with the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2601 et seq., and the regulations set forth in 40 C.F.R. Part 761. The modification would allow the installation of a low permeability geomembrane or geosynthetic clay liner (GCL) cap, covered with topsoil and vegetation over both of the TSCA Disposal Areas (i.e. the "Consolidated Material TSCA Disposal Area" and the "Former On-site Pond TSCA Disposal Area"), instead of the previously proposed asphalt cap. The newly proposed cap system will meet the requirements of 40 C.F.R. § 761.61(a)(7) and 40 C.F.R. § 264.310(a).

Please be advised that EPA has reviewed the information contained in your June 22<sup>nd</sup> correspondence and hereby approves Arsynco's request. Please note that all other terms and conditions of the February 12, 2009 risk-based PCB disposal approval remain in effect. If you have any questions, please contact Sam Abdellatif, of my staff, at (212) 637-4103.

Sincerely yours,

Adolph Everett, Chief  
Hazardous Waste Programs Branch

cc: Jay Nickerson, NJDEP CM-BCM

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

2890 WOODBRIDGE AVENUE  
EDISON, NEW JERSEY 08837-3679

MAR 16 2016

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

**Article Number: 7012 3460 0002 1646 4347**

Mr. James M. Clabby  
President  
JMC Environmental Consultants, Inc.  
2109 Bridge Avenue, Building B  
Point Pleasant, New Jersey 08742

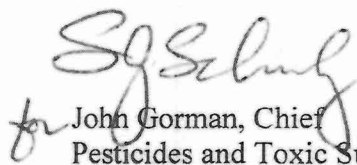
**Re: Request for Minor Modification to the 2009 Risk-Based Disposal Approval  
Arsynco, Inc. Site, Carlstadt, New Jersey  
EPA I.D. Number: NJD 044688935**

Dear Mr. Clabby:

This letter is in response to your January 12, 2016 correspondence regarding the above-referenced site. Your correspondence conveys a request, by Arsynco, Inc. (Arsynco), for a minor modification to the United States Environmental Protection Agency's (EPA's) February 12, 2009 risk-based polychlorinated biphenyl (PCB) disposal approval. The modification would allow PCB remediation waste to be disposed at a facility permitted under Subtitle C of the Resource Conservation and Recovery Act instead of a facility permitted under the Toxic Substances Control Act.

Please be advised that EPA has reviewed the information contained in your January 12<sup>th</sup> correspondence and hereby approves Arsynco's request. Please note that all other terms and conditions of the February 12, 2009 risk-based PCB disposal approval remain in effect. If you have any questions, please contact Sam Abdellatif of the Hazardous Waste Programs Branch at (212) 637-4103 or at [abdellatif.sameh@epa.gov](mailto:abdellatif.sameh@epa.gov).

Sincerely yours,

  
John Gorman, Chief  
Pesticides and Toxic Substances Branch

cc: Jay Nickerson, New Jersey Department of Environmental Protection